

ORIGINAL

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268**

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**Mailing Online Services**  
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**Docket No. MC98-1**

**FIRST SET OF INTERROGATORIES OF PITNEY BOWES INC.  
TO USPS WITNESS GARVEY  
(PB/USPS-T1-1-6)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,



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PB/USPS-T1-1

You testified at USPS-T1, 10, line 10, that payment for Mailing Online services by credit card will be permitted.

- a. What process or processes will be employed to verify credit card information?
- b. Will there be any limit imposed by the Postal Service, as opposed to the credit card issuing institution, on the amount that can be charged to a card for any given transaction or within any pre-established period of time?
- c. What will be the cost be to the Postal Service per dollar of MOL payments received by credit card?
- d. Identify all studies conducted by or for the Postal Service regarding the use of credit cards to pay fees for the use of Mailing Online and provide (or make available as library references) those studies.

PB/USPS-T1-2

You testified, at USPS-T1, 11, lines 10-12 that one of the goals of Mailing Online is "to reduce the aggregate cost of producing and entering a small mailing and provide a lower cost and more efficient way to use the mail."

- a. Is it your understanding that the printers with which the Postal Service will contract to produce MOL mailpieces will be required to use the permit imprint method for evidencing the payment of postage?
- b. If so, was consideration given to the fact that postage meters are generally considered to be more cost efficient ways of providing evidence of payment of postage than the permit imprint methodology?
- c. Do you know of any reason that the use of postage meters to show the postage of payment on MOL mailpieces is inconsistent with the general operation of the MOL program?

PB/USPS-T1-3

In response to OCA/USPS-T5-14-i, you testified (at least implicitly) that the Form 3600 was the only document to be supplied to the Postal Service on entry of First Class MOL mail at a postal facility.

- a. Is there any plan for additional or different documentation for First Class Mail entered during the experiment if it is approved?

- b. What is your understanding as to documentation that will be supplied to the entry Postal facility on the entry of Standard (A) mail?
  - c. Please provide examples of any documents (other than the Form 3600) referred to in your answers above.
  
- PB/USPS-T1-4      What requirements or restrictions will be imposed on payment of MOL fees by:

  - a. Prepaid account; or
  - b. Other approved payment method (USPS-T1, 10 I. 10)?
    - (i) To the extent of your answer to subpart a above describes a method different from that set out at 39 C.F.R. § 510.28(b), please explain any differences.
  
- PB/USPS-T1-5      Did the Postal Service consider contracting with a private service provider for verification of payments "via credit card, prepaid account, or other approved payment method" or any of those functions?
  
- PB/USPS-T1-6      Is the Postal Service's AMS database to which you make reference in your response to MASA/USPS-T5-8 (c) (redirected to you) available online to would-be competitors with the MOL offering?

  - a. If so, how is access obtained and what are the terms and conditions of access?
  - b. If not, why not?

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: October 26 1998

Ian Volner fw  
Ian D. Volner